

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: James F. Bareis :
Debtor :
 : Docket No. 19-12579-jkf
 :
Specialized Loan Services LLC : Chapter 13
Movant :
Vs. :
 :
James F. Bareis :
Respondent :
Respondent :
And :
Scott Waterman, Esquire :
Additional Respondent :
 :

RESPONSE TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Respondent, James F. Bareis, by and through his undersigned counsel, Michael J. McCrystal, Esquire and avers:

1. Admitted.
2. Admitted.
3. After reasonable investigation the answering respondent cannot admit or deny the truth or falsity of this averment and the same is deemed to be denied.

4. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure.
5. After reasonable investigation, the answering respondent cannot admit or deny the truth or falsity of this averment and the same is deemed to be denied.
6. Denied as stated, the Statements and Schedules of the Debtor speak for themselves.
7. Denied as stated, the Statements and Schedules of the Debtor speak for themselves.
8. Denied, this averment is specifically denied and it is averred to the contrary. By way of further answer, debtor alleges that it has made or will make each and every payment due under the Mortgage and the Note since the filing of the bankruptcy case.
9. After reasonable investigation, the answering respondent cannot admit or deny the truth or falsity of this averment and the same is deemed to be denied. See answer to averment no. 8.
10. Denied as a conclusion of law to which no responsive pleading is required under the Federal Rules of Bankruptcy Procedure.
11. Denied as a conclusion of law to which no responsive pleading is required under the Federal Rules of Bankruptcy Procedure.
12. Denied as a conclusion of law to which no responsive pleading is required under the Federal Rules of Bankruptcy Procedure.
13. Denied as a conclusion of law to which no responsive pleading is required under the Federal Rules of Bankruptcy Procedure.

WHEREFORE, Respondent prays this Honorable Court to deny the Motion for Relief from the Automatic Stay and for such other and further relief as this Honorable Court will deem just and equitable.

Respectfully submitted,

/s/ Michael J. McCrystal

Michael J. McCrystal, Esquire

Supreme Court ID No. 55064

151 Main Street, STE A

Emmaus, PA 18049

610 262-7873